

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

Cr. No. 20-cr-16-01-LM

IDRISSA GASANA

ASSENTED-TO MOTION TO CONTINUE TRIAL

Defendant Idrissa Gasana, by and through his counsel, Jeffrey S. Levin and Behzad Mirhashem, files this assented-to motion to --

- 1) continue the June 2024 trial date to a further date to be determined at a status conference in 45 days, and
- 2) freeze all current dates and deadlines for that period as well, and cancel the April 11, 2024 hearing, to allow the parties time to explore a negotiated settlement to the charges.

Grounds follow.

The parties are currently exploring a negotiated resolution to the charges. The parties need additional time to negotiate terms, gather the requisite approvals, and ensure that the client fully understands the plea proposal.

Toward this end, the parties seek a continuance of the current trial date, as well as a freezing of all the current dates (including scheduled hearing dates) and deadlines, to allow them additional time to engage in plea discussions. The parties also request that the April 11, 2024 hearing be canceled and that pending motions be held in abeyance.

The parties propose that a status hearing be scheduled in 45 days, at which time they may be prepared to report to the court that plea discussions are concluded or that they are ongoing. If concluded, the parties will either ask for another trial date (and for dates and deadlines to be reset) or for a change of plea hearing to be scheduled. If plea discussions are ongoing, the parties will report that to the Court and ask for a further status hearing to be scheduled at a future date.

No separate memorandum of law is attached.

The government assents to the requested relief, as per Jeffery Strelzin, AUSA.

Defense counsel certifies as follows: defense counsel has consulted with the defendant about the requested continuance; defense counsel has explained to the defendant that, by seeking a continuance, the defendant is waiving his constitutional and statutory rights to a speedy trial; the defendant has personally assented to the continuance; and defense counsel is mailing forthwith to the defendant a copy of the motion to continue.

Wherefore, the defendant respectfully requests that the Court grant the motion and such other relief as may be deemed just.

Respectfully Submitted,

/s/ Jeffrey S. Levin

Jeffrey S. Levin

NH Bar No. 12901

/s/ Behzad Mirhashem

Behzad Mirhashem

N.H. Bar No. 10031

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Certificate of Service

I hereby certify that on this 12th day of March, 2024, I caused a true and correct copy of the foregoing document to be served on opposing counsel, via CM/ECF electronic filing method.

/s/ Jeffrey S. Levin

Jeffrey S. Levin